

ENTERED

February 22, 2022

Nathan Ochsner, Clerk

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

| | |
|--------------------------|---------------------|
| In re: |) |
| |) |
| KELLEY HYDRAULICS, INC., |) Chapter 11 |
| |) |
| Debtor. |) Case No. 21-33269 |
| |) |
| |) |

**STIPULATION AND AGREED ORDER REGARDING THE BALLOT AND
OBJECTION DEADLINES FOR NLCG PRIVATE LENDING FUND, LLC**

(Related to Docket No. 48)

This stipulation and agreed order (“Stipulation and Agreed Order”) regarding the ballot and objection deadlines contained in this Court’s *Order to (I) Establish Plan Related Deadlines and (II) Set Confirmation Hearing (Re: Docket No. 32)* [Dkt. No. 48] (“Order”) is by and between Kelley Hydraulics, Inc. (the “Debtor”) and NLCG Private Lending Fund, LLC (“NLCG,” and with the Debtor, the “Parties”). The Parties hereby stipulate and agree as follows:

RECITALS

WHEREAS, on January 3, 2022, the Debtor filed its *Subchapter V Plan of Reorganization of Kelley Hydraulics, Inc. Dated January 3, 2022* [Dkt. No. 32] (the “Proposed Plan”) providing for certain treatment of the secured debt owed to NLCG;

WHEREAS, on January 25, 2022, the Court entered its Order establishing February 25, 2022 at 12:00 noon Central Time (CT) as the Ballot Deadline and Objection Deadline, as further defined therein;

WHEREAS, the Parties are engaged in good faith discussions and negotiations regarding certain terms and provisions of the Proposed Plan, including but not limited to the drafting and revision of the forbearance agreement that is referenced in the Proposed Plan;

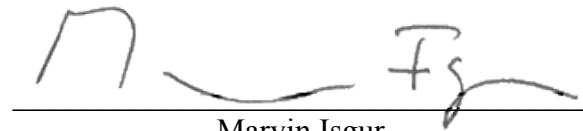
WHEREAS, in the furtherance of a consensual plan confirmation process, the Parties have reached an agreement to extend the Ballot Deadline and Objection Deadline for NLCG only;

**NOW, THEREFORE, IT IS HEREBY STIPULATED, AGREED, AND ORDERED
AS FOLLOWS:**

1. The Ballot Deadline and Objection Deadline, as defined in this Court's prior Order, for NLCG is March 4, 2022, at 5:00 pm Central Time (CT).

IT IS SO ORDERED.

Signed: February 22, 2022



Marvin Isgur
United States Bankruptcy Judge

AGREED AND ACCEPTED:

**HUGHES, WATTERS & ASKANASE,
LLP**

/s/ Alexander Perez
Alexander Perez
aperez@hwa.com
State Bar No. 24041076
1201 Louisiana, Suite 2800
Houston, TX 77002
Telephone: 713-759-0818
Facsimile: 713-759-6834

**ATTORNEYS FOR NLCG PRIVATE
LENDING FUND, LLC**

**WEYCER, KAPLAN, PULASKI & ZUBER,
P.C.**

/s/ Jeff Carruth*
Jeff Carruth
jcarruth@wkpz.com
State Bar No. 24001846
3030 Matlock Rd., Suite 201
Arlington, TX 76015
Telephone: 713-341-1158
Facsimile: 866-666-5322

ATTORNEYS FOR THE DEBTOR
*Signed with permission /s/ Alexander Perez